

## DISTRICT OF NEVADA

**STIPULATION AND (PROPOSED)  
ORDER TO STAY PROCEEDINGS  
(5th Request)**

2. On January 6, 2016, the parties stipulated to stay the proceedings in this matter

1 for thirty (30) days, in order to allow the parties to facilitate settlement.

2 3. The Court entered the parties' stipulation as an Order on January 14, 2016.

3 4. The Court's Order was due to expire on February 5, 2016.

4 5. Due to continuing settlement discussion, the parties stipulated to stay the matter  
5 for a second time on February 3, 2016.

6 6. The Court entered the parties' second stipulation as an Order on February 9,  
7 2016.

8 7. Due to continuing settlement discussion, the parties stipulated to stay the matter  
9 for a third time on March 3, 2016.

10 8. The Court entered the parties' third stipulation as an Order on April 7, 2016.

11 9. Due to continuing settlement discussion, the parties stipulated to stay the matter  
12 for a fourth time on April 7, 2016.

13 10. The Court entered the parties' fourth stipulation as an Order on April 20, 2016.

14 11. Productive settlement discussions are still ongoing, and accordingly, in an effort  
15 to facilitate those efforts, as well as to minimize attorneys' fees and other legal expenses, the  
16 parties believe that the present civil action should be stayed for an additional thirty (30) days.  
17

18 12. Therefore, the parties agree that the Court may enter the following Order and  
19 request that the Court do so accordingly:

20 a. Except as otherwise provided below, this action shall be stayed for a  
21 period of thirty (30) days from the date this stipulation is filed with the Court.  
22

23 b. The stay shall immediately terminate upon Plaintiff's filing with the

Court, and serving upon Defendant, a notice that Defendant must file an answer to Plaintiff's complaint in this action or otherwise respond to same in accordance with the *Federal Rules of Civil Procedure* and by no later than twenty-one (21) days after service of the notice.

c. The parties stipulate that nothing in this delay shall be deemed to prejudice Defendant's right to file an Anti-SLAPP motion, under NRS 41.635 *et. seq.*

**SO STIPULATED AND AGREED** on this 10th day of May, 2016.

**THE AMIN LAW GROUP, NV., LTD.**

**RANDAZZA LEGAL GROUP, PLLC**

/s/ Ismail Amin, Esq.

/s/ Marc Randazza, Esq.

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*Attorney for Plaintiff*

*Attorney for Defendant*

**IT IS SO ORDERED.**

  
UNITED STATES DISTRICT JUDGE

Dated: May 16, 2016

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Las Vegas, NV 89109  
Phone: (702) 990-3583 / Fax: (702) 990-3501

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 10<sup>th</sup> of May, 2016, I served a true and correct copy of:  
**STIPULATION AND (PROPOSED) ORDER TO STAY PROCEEDINGS (5<sup>th</sup> Request),**  
postage fully prepaid and addressed to the following:

\_\_\_\_\_ serving the following parties via US Mail, postage prepaid;

  X   serving the following parties via CM/ECF;

\_\_\_\_\_ serving the following parties via facsimile;

\_\_\_\_\_ serving the following parties via Overnight Express;

Marc J. Randazza, Esq.  
3625 South Town Center Drive  
Las Vegas, NV 89135  
***Attorney for Defendant***

      /s/ Daniella Flandez        
Daniella Flandez  
An Employee of THE AMIN LAW GROUP, NV., LTD.

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